2000-007422 3/20 4:08

31ST DISTRICT, NEW YORK

1119 LONGWORTH HOUSE OFFICE BUILDING WASHINGTON, DC 20515-3231

> PHONE: (202) 226-3161 FAX: (202) 225-5574



RECEIVED

MAR 2 1 2000

AND MEANS

SUBCOMMITTEE ON TRADE SUBCOMMITTEE ON OVERSIGHT

COMMITTEE ON INTERNATIONAL RELATIONS SUBCOMMITTEE ON AFRICA

Congress of the United States House of Representatives

March 6, 2000

Ms. Amy Stewart House Liaison U. S. Department of Energy 1000 Independence Avenue, SW Washington, DC 20585

Dear Ms. Stewart:

Just wanted to pass along some comments from Ms. Carrie Hedin about the Yucca Mountain Draft Environmental Impact Statement for your consideration in the comment review process.

Thanks for your time.

Sincerely,

Amo Houghton

AH/if Enclosure

cc: C. Hedin

.....

1110 LONGWORTH HOUSE OFFICE BUILDING WASHINGTON, DC 20515-3231

> PHONE: (202) 225-3161 FAX: (202) 225-5574



Congress of the United States House of Representatives

March 6, 2000

COMMITTEE ON WAYS AND MEANS SUBCOMMITTEE ON TRADE SUBCOMMITTEE ON CYERSIGHT CHARMAN

EIS001823

COMMITTEE ON INTERNATIONAL RELATIONS SUBCOMMITTEE ON AFRICA

Ms. Carrie E. Hedin 126 Emory Drive Jamestown, New York 14701

Dear Carrie:

Thanks very much for being in touch about the Yucca Mountain Draft Environmental Impact Statement. I always appreciate hearing your views and concerns.

As you may know, the Nuclear Waste Policy Amendments Act of 1999 is currently being reviewed by the House and Senate, and I will be sure to keep your concerns in mind. You make good points and I hope you don't mind me sharing them with the Energy Department. You may also send additional comments through the Internet at www.ymp.gov/timeline/eis/eis comment.htm or in writing to:

Ms. Wendy R. Dixon, EIS Program Manager Yucca Mountain Site Characterization Office Office of Civilian Radioactive Waste Management U. S. Department of Energy P.O. Box 30307, M/S 010 North Las Vegas, NV 89036-0307

Again, thanks for writing. I know this issue means a great deal to you and will welcome any further thoughts on the matter you'd like to share.

All the best,

Amo

Amo Houghton

AH/if Enclosure

32 DENISON PARKWAY WEST CORNING, NY 14830 (807) 937-3333 1-(800) 562-7431 FEDERAL BURLDING, ROOM 122 JAMESTOWN, NY 14701 (718) 484-0252 700 WESTGATE PLAZA OLEAN, NY 14780 1-(800) 582-7431

69 SOUTH STREET AUGURN, NY 13021 (315) 255-3045 1-(800) 582-7431

. . .

FEB _ 2 2000

To: Amo Houghton

United States Representative, State of New York

Federal Building

Jamestown, NY 14701

From: Carrie E. Hedin

126 Emory Drive

Jamestown, NY 14701

Enclosed are several of my objections to the US Department of Energy Draft Environmental Impact Statement (DEIS) of the proposed Yucca Mountain Nuclear Waste Repository. As a senior science major at the University of Notre Dame, I have been exposed to many scientific and technical reports and experiments. However, I have never seen a document filled with such "bad science" as this one. Based on this DEIS, the building of Yucca Mountain should not be allowed to proceed.

There are numberous inconsistent, incomplete, and incoherent claims made throughout this proposal for the Yucca Mountain Repository. These logical fallacies and flaws have severe ethical and moral consequences not only for today's world, but also for future generations. It is my hope that you will view these objections and concerns with utmost concern and decide to support the numerous scientists, researchers, and citizens in their goal to stop the building of this dangerous facility. Thank you.

47

State &

EIS001823

6 cont. would occur periodically over hundreds of thousands of years (a questionable prediction itself considering the fact that casks are still in the design phase and modern technology has not even existed for that long!). However, it then neglects to state what failure rates might be if disruptive events, such as an earthquake, were to occur. Since information regarding the low failure rates under normal conditions was provided, potential rates of failure from disruptive events should be included as well (DEIS, p. 5-15).

4

4

6...

EIS001823

Objections to the Draft Environmental Impact Statement (DEIS) for the Yucca Mountain Waste Repository

The Draft Environmental Impact Statement of the Yucca Mountain Waste Repository contains numerous problematic issues in regard to the way the study was performed. There are many incomplete, inconsistent, and incoherent claims made in this document, all of which lead one to disagree with the DOE's conclusion that the site is safe and suitable. In the following points, I address several of these claims and raise objections to what I believe is "bad science." I hope that these examples alone serve as a basis from which to further critique the Yucca Mountain study and object to the building of the waste repository.

- 1. The Draft Environmental Impact Statement is incomplete with regard to the definition of the "maximally exposed individual." The definition did not take into account differences in age, gender, and physical characteristics and also assumed that current lifestyles in the exposed area would remain consistent over the next 10,000 years. First of all, if the intent of the study is to determine protection for future generations, the maximally exposed individual should not be a person of mean or average lifestyle because it automatically results in some people (namely the old, young, sick, etc.) being less protected. In addition, while it is certainly not possible to know future lifestyle patterns, one cannot assume that characteristic conditions today will remain intact for thousands of years in the future. Therefore, the DEIS is wrong to rely on current averages to determine future levels of safety from the repository (DEIS, p. 5-26).
- 2. The DEIS is incomplete in various sections of the overall study when it discusses different radiation effects from the repository only over a 10,000 year time period. For example, in the analysis of the water-borne radiological consequences (Section 5.4), dose rates to individuals using groundwater were only estimated for the first 10,000 years after repository closure. When one considers that the serious effects of the waste could last for one million years (due to the extensive lifetime of many of the toxic materials in the repository), the DEIS is not fully reporting the radiation consequences of Yucca Mountain to the public (DEIS, p. 5-25).
 - 3. The DEIS is inconsistent when it states that water flows at highly variable rates through the saturated zone of Yucca Mountain because it states earlier that the amount of water affected would be minimal due to the low rate of flow (Section 5.2.3.1). By assuming a low flow rate (despite mentioning later that rates were variable), the DEIS underestimated the potential amount of seepage that could occur into the repository (DEIS, p. 5-10).
- 4. The DEIS is incomplete in its discussion of human intrusion because it admitted the possibility of intrusion when it described a potential event, but then did not further discuss the impact of such an intrusion in its final results (Section 5.2.3.5). While it is difficult to predict future human activity, one cannot completely dismiss the discussion of possible consequences that could occur through human impact simply because exact scenarios are not known. By not including the possible consequences of human intrusion, the DEIS fails to fully consider the potential radiological impacts that could occur from the building of the repository (DEIS, p. 5-16).
 - 5. The DEIS is incomplete in its analysis of the proposed casks for use at the waste repository because it did not include failure rates under extreme conditions (when there is actually the highest potential for failure). In section 5.2.3.4, it reports that package failures

... **i**e